

US GOV'T District Court
WORCESTER COUNTY

Enoch Mayfields)
)
)
Plaintiff)
Vs)

Civil Action No.

The Bulletin)
Defendant)

COMPLAINT

The Plaintiff, Enoch Mayfields, resides address 316 Crownshield Ave, Uxbridge, MA, 01569. The defendant 'The Bulletin' a corporate entity address 10 Railroad Pl, Norwich, Ct 06360.

NATURE OF ACTION AND JURISDICTION

This is a civil action under 42 U.S.C § 1983 seeking damages and injunctive relief against Defendants for committing acts, under color of law. Plaintiff seeks nuisance and exception of the 'Statutory of limitation' Kyle Graham, The continuing violations Doctrine, 43 Gonz. L. Rev. 271 (2008) The continuing violations doctrine, the continuing misconduct of defendant social media Defamation and Libel against plaintiff. With the intent and for the purpose to slander/libel plaintiff name to target of reckless and biased purposely bad reporting, towards the favor of Daniel Hunter who is best friend with the reporter James Mosher (an employee of 'The Bulletin) underlying conduct M.G.L. C. 12. SS 11H, 11i, 11J

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U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

- 1.) In support of this, On or about October 14, 2008 plaintiff came into agreement with Daniel Hunter who resides at 101 Leha Ave, Norwich, Ct, 06360 as a licensed contractor in Ct to build a garage 30x16 as a tool shed.
- 2.) Mr. Daniel Hunter given plaintiff a document of submitted permit application which was DENIED by town of Norwich because of variance later known to plaintiff.
- 3.) Plaintiff hired subcontractors to build the garage but encountered serious problems with drug dealers who entered upon the property of Daniel Hunter 101 Leha Ave; demanding returned money for bad drugs; which caused a physical altercation between subcontractors and drug dealer on the premise of Daniel Hunter 101 Leha Ave.
- 4.) On or about November 5, 2008, plaintiff learned that Mr. Daniel Hunter served much prison time of Ct. for 'drug dealing' in the state of Ct.
- 5.) Upon completion of garage on or about November 10, 2008, Daniel Hunter contacted plaintiff because of altercation with some of his alleged dealers and wanted to know plaintiff side of the physical altercation and wanted to speak with subcontractors (which plaintiff would not do because of threats by Mr. Daniel Hunter). A few days later, Daniel Hunter called the plaintiff because he discovered a leak in his garage and wanted the subcontractors to come back to his house and repair leaky roof, which in Daniel Hunter anger he and his dealer wanted to physically challenged the subcontractor(s) only in retrospect of the physical altercation which was later known by plaintiff by the subcontractors whom supposedly got the best of dealers in defending themselves.

- 6.) Plaintiff, would not put his subcontractors within the reach of Mr. Daniel Hunter rage but offered to hire someone to finish job but Mr. Hunter would not agree to that term. After many attempts, Mr. Hunter given plaintiff the only alternative to get the subcontractor to return or plaintiff will have Hell to pay.
- 7.) Few months later, plaintiff lost his commercial account with Stop N' Shop (which was plaintiff life line.) because of cut backs and changes which caused plaintiff to go into bankruptcy.
- 8.) Mr. Daniel Hunter was made notice that plaintiff was in bankruptcy but continued to pursue small claim action against plaintiff in Framingham, MA District Court.
- 9.) Plaintiff bankruptcy Attorney Richard Rovosa contacted Small Claims Court to inform them that plaintiff was in 'Automatic Stay' and will not be appearing. Plaintiff also taken bankruptcy document(s) to Framingham District Court to file the document of plaintiff 'no show'
- 10.) Including, on date set by Small Claims Court of Framingham Massachusetts of appearance date of plaintiff; the plaintiff and Bankruptcy attorney contacted the Small claims Court of Framingham MA to inform them again there was a conflict of interest of date because plaintiff had to appear in criminal court for reckless driving in Ct. On same date and time. And Bankruptcy Attorney reassure Small Claim Court that plaintiff was in 'Automatic Stay' with US bankruptcy court.
- 11.) Under many attempts with District Court of Framingham - it was the gross negligence of Small Claim Court of Framingham MA after many attempts of contacts and

personal deliveries of bankruptcy document(s). The case was still heard without the presence of plaintiff.

- 12.) Daniel Hunter was awarded judgement against plaintiff while plaintiff was in 'Automatic Stay' with the US bankruptcy Court.
- 13.) Plaintiff, went to building Dept. in Norwich Ct. and spoken with Peter Zvingilas (building dept in Norwich Ct.) and was informed by Peter Zvingilas that Daniel Hunter initial building permit was denied because it didn't meet certain various or restriction and that plaintiff should not do any further work until this matter was rectified.
- 14.) Daniel Hunter proceeded and was given restitution from the HIC of Ct thereafter...Mr. Daniel Hunter contacted plaintiff and told plaintiff 'if he would have given over the subcontractors, plaintiff would have avoided the upcoming and continue onslaught of Mr. Daniel Hunter.
- 15.) Daniel Hunter verbally told plaintiff of what his friend James Mosher at 'The Bulletin' have planned for plaintiff, and that plaintiff will never work again as a contractor. And he will end the career of my kind of people who shouldn't be working as contractors but should be working as slaves.
- 16.) James Mosher an employee of 'The Bulletin' conspired with reckless and purposely reported bad information without consulting plaintiff but conspired with Daniel Hunter in effort to destroy the reputation of plaintiff.
- 17.) Mr. Daniel Hunter contacted plaintiff after reporting with his friend James Mosher at 'The Bulletin' mocking and laughing how he knows how to manipulate the system and plaintiff should have listened to Mr. Daniel Hunter.

- 18.) Plaintiff, later contacted James Mosher at 'The Bulletin' after Daniel Hunter called plaintiff in giving plaintiff the news of the successful outcome of the reporting of his friend James Mosher.
- 19.) James Mosher at 'The Bulletin' told plaintiff that he had no phone number to reach plaintiff (which is further from the truth.) further after plaintiff tried to explain to James Mosher how he's initiating bias reporting; James Mosher said, he will hear plaintiff side but reprinted another article dismissing all information given about Mr. Daniel Hunter and his previous prison term and allegation never look into. After plaintiff told James Mosher from 'The Bulletin' that he knows Mr. Daniel Hunter is his best friend, James Mosher immediately ended the phone call by hanging up.

CAUSES OF ACTION

- 20.) The foregoing allegations are incorporated as if re-alleged herein
- 21.) Defendant employee purposely targeted plaintiff to destroy reputation with underlying conduct M.G.L. C. 12. SS 11H, 11i, 11J
- 22.) Defendant used his employer 'The Bulletin' tools as a means of Defamation of character to fulfill his friend Daniel Hunter conspiring bias action
- 23.) Plaintiff contacted 'The Bulletin' and spoken with various manager who alleged they would get back to plaintiff and never did and ignored any further request of plaintiff.

- 24.) Plaintiff online reputation has been destroyed and plaintiff has lost much employment because of the biased article written by 'The Bulletin' about plaintiff
- 25.) Plaintiff line of work depends on internet social media 80% of work, which has been destroyed by defendant.
- 26.) Defendants acted intentionally and with callous disregard for Plaintiff known statutory and constitutional rights.
- 27.) As a direct and proximate results of the Defendants violations of Plaintiff statutory and constitutional rights as described herein, Plaintiff has suffered damage to reputation, humiliation, embarrassment, mental and emotional anguish and distress and violation of rights.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Enoch Mayfields, request judgment against Defendants as follows:

- A. For appropriate declaratory relief regarding the unlawful and unconstitutional acts and practices of Defendants.
- B. For appropriate compensatory damages in an amount of \$1,000,000,000.00
- C. For such other and further relief to which Plaintiff may show himself justly entitled.

PLAINTIFF REQUESTS TRIAL BY JURY ON ALL ISSUES SO TRIABLE.

Respectfully submitted,

Enoch Mayfields
316 Crownshield Ave
Uxbridge, MA 01569
508-630-4534

A handwritten signature in black ink, appearing to be 'E. Mayfields', written over a horizontal line.

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

Enoch Mayfields

Case No. _____

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

The Bulletin

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Enoch Mayfields
Street Address	316 Crownshield Ave
City and County	Uxbridge and Worcester County
State and Zip Code	Massachusetts, 01569
Telephone Number	508-630-4534
E-mail Address	enoch@groundwaterlocate.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 09/16) Complaint for a Civil Case

Defendant No. 1

Name	<u>The Bulletin</u>
Job or Title <i>(if known)</i>	<u></u>
Street Address	<u>10 Railroad Pl</u>
City and County	<u>Norwich and New London County</u>
State and Zip Code	<u>Ct, 06360</u>
Telephone Number	<u>860-887-9211</u>
E-mail Address <i>(if known)</i>	<u></u>

Defendant No. 2

Name	<u></u>
Job or Title <i>(if known)</i>	<u></u>
Street Address	<u></u>
City and County	<u></u>
State and Zip Code	<u></u>
Telephone Number	<u></u>
E-mail Address <i>(if known)</i>	<u></u>

Defendant No. 3

Name	<u></u>
Job or Title <i>(if known)</i>	<u></u>
Street Address	<u></u>
City and County	<u></u>
State and Zip Code	<u></u>
Telephone Number	<u></u>
E-mail Address <i>(if known)</i>	<u></u>

Defendant No. 4

Name	<u></u>
Job or Title <i>(if known)</i>	<u></u>
Street Address	<u></u>
City and County	<u></u>
State and Zip Code	<u></u>
Telephone Number	<u></u>
E-mail Address <i>(if known)</i>	<u></u>

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Enoch Mayfields, is a citizen of the State of *(name)* Massachusetts.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* The Bulletin, is a citizen of the State of *(name)* Norwich, Ct. Or is a citizen of *(foreign nation)* _____.

b. If the defendant is a corporation

The defendant, (name) The Bulletin, is incorporated under the laws of the State of (name) Norwich, Ct, and has its principal place of business in the State of (name) Norwich.
 Or is incorporated under the laws of (foreign nation) New London County, and has its principal place of business in (name) Norwich.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because *(explain)*:

The pain and suffering and lost of work because of defamation of character/libel, and Civil right violated.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The writer of the article James Mosher who works/worked for 'The Bulletin' who is best friend with Daniel Hunter target of reckless and purposely bad reporting, defamation/libel biased report of Plaintiff; toward the favor of his friend Daniel Hunter.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Relief of damages of employment; including punitive and exemplary damages of 1,000,000.00

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: _____

Signature of Plaintiff

Printed Name of Plaintiff



 Enoch Mayfields

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address